

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO PROFESSIONAL FOOTBALL PUBLICATION ASSOCIATION
WITNESS JONES (USPS/PFPA-T1-1-6)

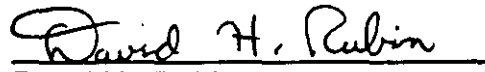
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to Professional Football Publication Association witness Jones: USPS/PFPA-T1-1 to 6.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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June 19, 2000

USPS/PFPA-T1-1. Please refer to your testimony on page 8 where you state, "Because reader complaints have been a virtual plague these past few years, PFPA has turned increasing attention to finding solutions."

- (a) Please confirm that Postal Service officials at various levels have worked with your organization in order to improve the service for your publications. If you do not confirm, please explain why.
- (b) Please confirm that you (or someone on your staff) have provided the Postal Service a list in electronic format of all reader complaints for all the publications listed on page 2 of your testimony in calendar year 1999. If you do not confirm please provide a list of all complaints for these publications for calendar year 1999.
- (c) Based on the complaint information provided to the Postal Service, please confirm that the total numbers of reader complaints for calendar year 1999 are 197, 295, 241, 371 and 96 respectively for Skins Report, Shout, Giants Insider, Silver and Black Illustrated, and Jets Confidential (including complaints from foreign destinations). If you do not confirm, please explain why and provide your counts of calendar year 1999 complaints by publication.
- (d) Based on the complaint information provided to the Postal Service, please confirm that the total number of complaints for calendar year 1999 add up to 1200, including 12 complaints for issues that were mailed to foreign subscribers. If you do not confirm, please provide your estimate of the total number of complaints for calendar year 1999.

- (e) Please confirm that the publications listed at page 2 of your testimony are not sold at the newsstand, and that all the copies are mailed through the Postal Service. If you do not confirm, please explain why.
- (f) Please confirm that you mailed 31 issues of each of these publications. This was derived based on the assumption that you mail weekly issues during the football season (August through January) and monthly issues during off-season. If you do not confirm, then please provide the number of issues mailed for each publication listed on page 2 of your testimony.

USPS/PFPA-T1-2.

- (a) Based on the circulation of 6,000 for Skins Report provided by you on page 2 of your testimony and the assumption that you mail 31 issues, please confirm that the total number of copies of Skins Report mailed is 186,000 for calendar year 1999. If you do not confirm, please explain why, and provide your estimate of the number of copies mailed.
- (b) Based on 197 reader complaints for Skins Report in calendar year 1999 (including 2 complaints from foreign destinations), please confirm that reader complaints are 0.11 percent of total pieces mailed of 186,000. If you do not confirm, please explain why, and provide your estimate of complaints as a percentage of pieces mailed.
- (c) Also, please confirm that if the number of issues for Skins Report is 25 instead of 31, the mailed pieces reduce to 150,000 and reader complaints as a percent of total pieces mailed increase to 0.13 percent. If you do not confirm, please explain why.

USPS/PFPA-T1-3.

- (a) Based on the circulation of 13,000 for Shout provided by you on page 2 of your testimony and the assumption that you mail 31 issues, please confirm that the total number of copies mailed for Shout is 403,000 for calendar year 1999. If you do not confirm, please explain why, and provide your estimate of the number of copies mailed.
- (b) Based on 295 reader complaints for Shout in calendar year 1999 (including 4 complaints from foreign destinations), please confirm that reader complaints are 0.07 percent of total pieces mailed of 403,000. If you do not confirm, please explain why, and provide your estimate of complaints as a percentage of pieces mailed.
- (c) Please confirm that if the number of issues for Shout is 25 instead of 31, the mailed pieces reduce to 325,000 and reader complaints as a percent of total pieces mailed increase to 0.09 percent. If you do not confirm, please explain why.

USPS/PFPA-T1-4.

- (a) Based on the circulation of 11,000 for Giants Insider provided by you on page 2 of your testimony and the assumption that you mail 31 issues, please confirm that the total number of copies mailed for Giants Insider is 341,000 for calendar year 1999. If you do not confirm, please explain why, and provide your estimate of the number of copies mailed.
- (b) Based on 241 reader complaints for Giants Insider in 1999 (including 2 complaints from foreign destinations), please confirm that reader

complaints are 0.07 percent of total pieces mailed of 341,000. If you do not confirm, please explain why, and provide your estimate of complaints as a percentage of pieces mailed.

- (c) Please confirm that if the number of issues for Giants Insider is 25 instead of 31, the mailed pieces reduce to 275,000 and reader complaints as a percent of total pieces mailed increase to 0.09 percent. If you do not confirm, please explain why.

USPS/PFPA-T1-5.


- (a) Based on the circulation of 9,000 for Silver & Black Illustrated provided by you on page 2 of your testimony and the assumption that you mail 31 issues, please confirm that the total number of copies mailed for Silver & Black Illustrated is 279,000 in a calendar year. If you do not confirm, please explain why, and provide your estimate of the number of copies mailed.
- (b) Based on 371 reader complaints for Silver & Black Illustrated in calendar year 1999 (including 2 complaints from foreign destinations), please confirm that reader complaints are 0.13 percent of total pieces mailed of 279,000. If you do not confirm, please explain why, and provide your estimate of complaints as a percentage of pieces mailed.
- (c) Please confirm that if the number of issues for Silver & Black Illustrated is 25 instead of 31, the mailed pieces reduce to 225,000 and reader complaints as a percent of total pieces mailed increase to 0.16 percent. If you do not confirm, please explain why.

USPS/PFPA-T1-6.

- (a) Based on the circulation of 9,000 for Jets Confidential provided by you on page 2 of your testimony and the assumption that you mail 31 issues, please confirm that the total number of copies mailed for Jets Confidential is 279,000 in a calendar year. If you do not confirm, please explain why, and provide your estimate of the number of copies mailed.
- (b) Based on 96 reader complaints for Jets Confidential in calendar year 1999 (including 2 complaints from foreign destinations), please confirm that reader complaints were 0.03 percent of total pieces mailed of 279,000. If you do not confirm, please explain why, and provide your estimate of complaints as a percentage of pieces mailed.
- (c) Also, please confirm that if the number of issues for Jets Confidential is 25 instead of 31, the mailed pieces reduce to 225,000 and reader complaints as a percent of total pieces mailed increase to 0.04 percent. If you do not confirm, please explain why.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


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June 19, 2000